

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

COMMONWEALTH OF PUERTO RICO, et al.,

Defendants.

CIVIL NO. 12-2039 (GAG)

**MOTION SUBMITTING TENTH BI-ANNUAL STATUS REPORT
PURSUANT TO PARAGRAPH 261 AND
REQUEST FOR LEAVE TO FILE SPANISH LANGUAGE DOCUMENTS**

TO THE HONORABLE COURT:

COME NOW Defendants Commonwealth of Puerto Rico and the Puerto Rico Police Department (“PRPB”), by and through the undersigned counsel, and respectfully inform the Court as follows:

1. Pursuant to Paragraph 261 of the Agreement for the Sustainable Reform of the Puerto Rico Police Department (the “Agreement”), the PRPB is to file a bi-annual status report (the “Status Report”) on the progress made in the implementation of the Agreement, as well as to respond to any concerns raised by the Technical Compliance Advisor in his report, “no later than 15 days before the end of the period under review.” Docket No. 57, ¶261.

2. As explained to the Court at an in-chambers meeting held on September 26, 2019 with the Parties and the Interim Monitor, the PRPB did not file its Status Report in the timeframe required by the Agreement for the following reasons. First, the TCA resigned from his position without complying with his obligation under the Agreement to deliver to the PRPB his own report. Therefore, the PRPB did not have the benefit of the TCA’s assessment and the opportunity to respond accordingly. Second, the PRPB, with Plaintiff and the Interim Monitor, devoted the last six (6) months to developing, discussing and ultimately agreeing on

the consensus monitoring methodology for the eleven (11) areas of the Agreement. Having the Court already approved the methodology, the compliance monitoring phase has started.

3. Notwithstanding the above, and for the benefit of the Court and the Interim Monitor and his team, the PRPB prepared and hereby submits its Tenth Bi-Annual Status Report, as Exhibit 1 to this motion.

4. The Status Report as well as the Exhibits attached thereto, are all in the Spanish language. Accordingly, the PRPB hereby requests leave to file the Status Report and Exhibits in the Spanish language, and that thirty (30) days to file translated versions of said documents be granted.

WHEREFORE, PRPB respectfully requests the Court to take notice of the above, and grant (a) leave to file the Status Report in Spanish and (b) an extension of time of thirty (30) days to submit the English translation.

RESPECTFULLY SUBMITTED.

WE HEREBY CERTIFY: That today we have electronically filed the foregoing document with the Clerk of the Court for the District of Puerto Rico, using the CM/ECF system which will send a copy and notification of filing to all counsel of record.

In San Juan, Puerto Rico, this 6th day of November, 2019.

By:

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